

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP
Attorneys for Defendant
Four Times Square
New York, NY 10036-6522

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

MANSEL OIL LIMITED,

Plaintiff,

- against -

SWIFT AVIATION GROUP, INC.,

Defendants.

:

:

:

:

ECF case

08 Civ. 1086 (GBD)

Electronically Filed

**NOTICE OF
CROSS-MOTION**

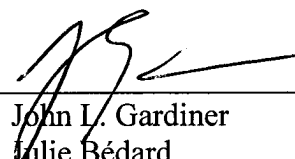
----- X

S I R S:

PLEASE TAKE NOTICE that pursuant to Sections 3 and 8 of the Federal Arbitration Act ("FAA"), 9 U.S.C. § 3, 8, and upon the accompanying Declaration of Jeff A. Shumway, Declaration of John L. Gardiner and Memorandum of Law on behalf of Swift Aviation Group, Inc. ("Swift Aviation Group") in Support of Cross-Motion to Stay Claims in Favor of Arbitration, the undersigned will move before the Honorable George B. Daniels, United States District Judge, in Courtroom 15D at the United States District Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007 for an Order Staying the Plaintiff's Claims in Favor of Arbitration, and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
April 21, 2008

BY: _____


John L. Gardiner
Julie Bédard
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
Four Times Square
New York, New York 10036
(212) 735-3000
John.Gardiner@skadden.com
Julie.Bedard@skadden.com

Attorneys for Defendant

TO: BLANK ROME LLP
Attorneys for Plaintiff
The Chrysler Building
405 Lexington Avenue
New York, NY 10174-0208
Attention: LeRoy Lambert, Esq.

TO: McDERMOTT & RADZIK, LLP
Attorneys for Intervenor, Swift Air, LLC
Wall Street Plaza
88 Pine Street- 21st Floor
New York, New York 10005-1801
(212) 376-6400
Attention: Edward C. Radzik, Esq.